



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

22 October 1996

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Proposed Plan - Site 10 (Camp Fogarty)
Naval Construction Battalion Center, Davisville, Rhode Island
Submitted 15 August 1996, Dated 14 August 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document. Comments are attached.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK

letter1.rwg/richg

Comments For:

**Proposed Plan For:
Site 10 (Camp Fogarty)
Naval Construction Battalion Center
Davisville, Rhode Island**

Submitted 15 August 1996

**1. Page 5, Section 2.6, Additional Public Information;
RIDEM Listing.**

Please change Rhode Island DEM contact to:

RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908

Contact Person:
Richard Gottlieb
(401) 277-3872 x7138

**2. Page 17, Section 3.4.7, Evaluation of Potential Future Risk (Site 10 - Camp Fogarty Disposal Area)
Paragraph 1, Sentence 3.**

The Navy has evaluated the lead levels in surface soils with respect to Rhode Island lead regulations, and the average concentration of the discrete soil samples was within the defined "lead free" range.

Since the Navy is proposing a no further action for Site 10 it must therefore meet residential environmental criteria. Site 10 had four locations where lead was detected at concentrations above the "lead free" level of 150 ppm ranging from 188 to 655 ppm and one location where the concentration was above the "lead safe" level of 500 ppm. as defined in Sections B.1.1(a)(1) and B.2.4(b)(i) of the Rules and regulations for Lead Poisoning Prevention [R 23-24.6-PB] of the Rhode Island department of Health. This level would require a lead management plan. Sections B.1.5(a)(5) and B.3.3(c)(4) of the above mentioned regulations require a composite sample. The Navy did not obtain composite samples, but rather took discrete samples. It may be possible to obtain a variance from the regulations whereby discrete samples can be averaged to simulate a composite sample. RIDEM is requesting that the Navy apply for an application for a variance from the Rhode Island Rules and regulations for lead Poisoning Prevention [R-23-24.6-PB] Sections B.1.5(a)(5) and B.3.3(c)(4) relating to soil lead evaluation. Please note that the format used for Site 05 and 08 (dated 22 March 1995) should be used for Site 10. Please contact RIDEM prior to transmitting the variance request to the RI Department of health.

3. Page 19, Section 3.6, Navy's Rationale for NFA Preferred Alternativ (Sit 10 - Camp

**Fogarty Disposal Area);
Paragraph 2, Sentence 4.**

Although RIDOH regulations specify a representative composite soil sample be used in the evaluation of lead in soils, the average of discrete samples, which was used for site 10, is accepted by RIDOH as a surrogate for composite samples.

Please note that RIDOH accepts discrete samples after a variance from the regulations has been obtained.

In addition, this paragraph notes that 35 soil samples were collected at Site 10 which had an average concentration of 90 mg/kg. Based on the Phase II RI report, dated July 1994 eight surface soil samples were obtained during the Phase I investigation and 20 surface soil samples were obtained during the Phase II investigation. These 28 samples have an average lead concentration of 103 mg/kg. Please explain where the other seven samples came from.

**4. Page 20, Section 4.0, For More Information;
RIDEM Listing.**

Please change Rhode Island DEM contact to:

Richard Gottlieb
RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908
Phone (401) 277-3872 x7138

5. Glossary, "Lead-Safe" Definition.

This definition notes "lead-safe" as containing anywhere from 150 to 1,000 ppm of lead in the soil. Based on Section B.2.4(2) of the Rhode Island Department of Health Rules and Regulations for lead Poisoning Prevention "lead-safe" is defined as containing anywhere from 150 to 500 ppm of lead in the soil. Please revise this definition.